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Proposed Attorneys for Debtor Naartjie Custom Kids, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

NAARTJIE CUSTOM KIDS, INC.,

Debtor.

Bankr. Case No. 14-29666

Chapter 7

The Honorable William T. Thurman

***EX PARTE* MOTION FOR ORDER SHORTENING TIME FOR NOTICE, OBJECTION
AND HEARING IN CONSIDERATION OF FIRST DAY MOTIONS**

On the date hereof (the “Petition Date”), the above-captioned debtor and debtor-in-possession (the “Debtor”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Chapter 11 Case”).

For the reasons set forth in the *Declaration of Jeff Nerland in Support of Chapter 11 Petition and First Day Motions* (the “Omnibus Declaration”), proposed counsel for the Debtor

submits this Ex Parte Motion for Order Shortening Time for Notice, Objection and Hearing in the following first-day matters (the “First Day Motions”):

1. *Debtor’s Motion Pursuant to 11 U.S.C. §§ 105, 363, and 503 and Fed. R. Bankr. R. 6003 and 6004 for Interim and Final Orders Authorizing (I) the Debtor to Honor Prepetition Obligations to and Continue Prepetition Practice with a Certain Critical Vendor and Certain Shippers; (II) Authorizing all Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the “Critical Vendors Motion”).* [Docket No. 3]
2. *Emergency Motion for Order Authorizing Debtor to Continue Use of its Existing Bank Accounts and Existing Business Forms (the “Cash Management Motion”).* [Docket No. 4]
3. *Emergency Motion for Interim and Final Orders (I) Authorizing but not Directing Payment of Pre-Petition Wages, Salaries, and Related Obligations and Taxes; (II) Directing All Banks to Honor Checks and Transfers for Payment of Pre-Petition Employee Obligations; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the “Wages and Employee Obligations Motion”).* [Docket No. 5]
4. *Motion for Entry of Interim and Final Orders: (I) Authorizing, but not Directing, Debtor to (A) Maintain Existing Insurance Programs and (B) Pay all Obligations in Respect Thereof; (II) Directing Financial Institutions to Honor and Process All Related Checks and Electronic Payment Requests; and (III) Scheduling a Final*

- Hearing to Consider Entry of a Final Order (the “Insurance Motion”). [Docket No. 6]*
5. *Motion for Entry of Interim and Final Orders (I) Authorizing, but not Directing, the Debtor to Honor Certain Prepetition Customer Obligations and to Continue Prepetition Customer Programs and Practices in the Ordinary Course of Business; (II) Authorizing Payment of Credit Card Processing Fees; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the “Customer Programs Motion”). [Docket No. 7]*
6. *Debtor’s Motion for Interim and Final Orders (I) Prohibiting Utility Companies from Discontinuing, Altering, or Refusing Service to the Debtor on Account of Pre-Petition Invoices, (II) Approving the Debtor’s Proposed Form of Adequate Assurance of Future Payment, (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance, and (IV) Scheduling a Final Hearing (the “Utilities Motion”). [Docket No. 8]*
7. *Debtor’s Motion for Entry of Interim and Final Orders: (I) Authorizing, but not Directing, the Debtor to Pay Certain Pre-Petition Sales, Use, Customs, Income, Property, and Other Miscellaneous Taxes and Fees; (II) Granting Related Relief; and (III) Scheduling a Final Hearing to Consider Entry of a Final Order (the “Taxes Motion”). [Docket No. 9]*
8. *Debtor’s Motion for Interim and Final Orders (I) Authorizing Debtor in Possession to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 364; (II) Granting Liens, Security Interests, and Superpriority Claims; (III)*

Authorizing Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief (the “DIP Motion”).

9. *Application of the Debtor for Entry of an Order Authorizing the Retention and Employment of Dorsey & Whitney LLP as Counsel for the Debtor (the “Dorsey Employment Application” and collectively with the foregoing motions and applications, the “First Day Motions”).*

NOTICE

Notice of the First Day Motions, and this Motion, have been given to (i) the Office of the United States Trustee for the District of Utah; (ii) the Debtor’s twenty (20) largest unsecured creditors; (iii) counsel for Salus Capital Partners, LLC, Greenberg Traurig, One International Place, Boston, MA 02110, Attn: Jeffrey M. Wolf; (iv) those parties who have filed a notice of appearance and request for service of pleadings in this Chapter 11 Case pursuant to Bankruptcy Rule 2002; and (v) any party believed to be affected by each Motion. In light of the nature of the relief requested herein, the Debtor submits that no other or further notice is required.

RELIEF REQUESTED

Accordingly, the Debtor requests that the Court conduct a hearing on the First Day Motions on Monday, September 15, 2014.

DATED this 12th day of September, 2014.

DORSEY & WHITNEY LLP

/s/ Annette W. Jarvis

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*Proposed Attorneys for Debtor Naartjie
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